



# California Fair Political Practices Commission

January 29, 1990

David Cameron  
2100-A G Street  
Sacramento, CA 95816

Re: Your Request for Informal  
Assistance  
Our File No. I-89-701

Dear Mr. Cameron:

You have requested advice concerning the campaign provisions of the Political Reform Act.<sup>1/</sup> Your letter states only a general question. Therefore, we consider it to be a request for informal assistance pursuant to Regulation 18329(c).<sup>2/</sup>

## QUESTION

What is the filing requirement for a committee primarily formed to support the qualification of a ballot measure when the committee's qualification effort extends over two years?

## CONCLUSION

The period covered in the initial campaign report required of a committee primarily formed to support the qualification of a ballot measure begins on January 1 of the year in which the qualification effort began through seven days prior to the date when the statement is due. The statement is due not later than 21 days after the date any petitions are filed or 21 days after the deadline for filing petitions, whichever is earlier.

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1/ Government Code Sections 81000-91015. All statutory references are to the Government Code unless otherwise indicated. Commission regulations appear at 2 California Code of Regulations Section 18000, et seq. All references to regulations are to Title 2, Division 6 of the California Code of Regulations.

2/ Informal assistance does not provide the requestor with the immunity provided by an opinion or formal written advice. (Government Code Section 83114; 2 Cal. Code of Regs. Section 18329(c)(3).)

### ANALYSIS

A committee formed or existing primarily to support the qualification of a ballot measure must file its first campaign statement disclosing contributions received and expenditures made in connection with the qualification effort 21 days after any petitions are filed, or 21 days after the deadline for filing petitions, whichever is earlier. The closing date for the period is seven days prior to the deadline for filing the statement. (Section 84200.5(f).)

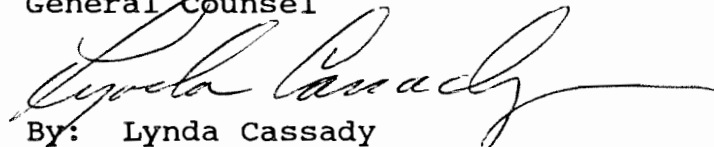
When the qualification effort extends over two calendar years, the period covered in the 21-day post-qualification campaign statement begins on January 1 of the year the qualification effort began. (Section 82018.) Thus, the statement will disclose activity which occurred in two calendar years.

After filing the 21-day post-qualification statement, the committee may have additional filing obligations depending on its activities. Enclosed is the 1989 "Information Manual On Campaign Disclosure Provisions of the Political Reform Act" which describes committee disclosure requirements.

Please do not hesitate to contact me at (916) 322-5662 if you have additional questions.

Sincerely,

Kathryn E. Donovan  
General Counsel

  
By: Lynda Cassady  
Political Reform Consultant

Enclosure

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David Cameron  
2100-A G Street  
Sacramento, CA 95816

December 19, 1989

Fair Political Practice Commission  
P.O. Box 807  
Sacramento, California 95804

Dear Gentlepersons:

I want to confirm that the first campaign report that needs to be filed for an initiative is 21 days after any petitions are filed, or 21 days after the deadline for filing petitions, whichever is earlier.

My specific question is, does this rule apply even when the initiative is kicked off in the fall of one year and the petitions are filed in the spring of the next year?

If so, does the first report cover the whole 12 months of the first calendar year and from January 1st of the second calendar year through seven days prior to the date when the statement is due?

Sincerely,

A handwritten signature in dark ink, appearing to be 'David Cameron', with a long horizontal flourish extending to the right.

David Cameron



# California Fair Political Practices Commission

December 22, 1989

David Cameron  
2100-A G Street  
Sacramento, CA 95816

Re: Letter No. 89-701


Dear Mr. Cameron:

Your letter requesting advice under the Political Reform Act was received on December 20, 1989 by the Fair Political Practices Commission. If you have any questions about your advice request, you may contact me directly at (916) 322-5662.

We try to answer all advice requests promptly. Therefore, unless your request poses particularly complex legal questions, or more information is needed, you should expect a response within 21 working days if your request seeks formal written advice. If more information is needed, the person assigned to prepare a response to your request will contact you shortly to advise you as to the information needed. If your request is for informal assistance, we will answer it as quickly as we can. (See Commission Regulation 18329 (2 Cal. Code of Regs. Sec. 18329).)

You also should be aware that your letter and our response are public records which may be disclosed to the public upon receipt of a proper request for disclosure.

Very truly yours,

  
Jeanne Pritchard  
Chief Technical Assistance  
and Analysis Division

JP:plh